

**REQUIRED STATEMENT  
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor(s) John A Hopkins, III; Case No. 16-39701 Chapter 13

All Cases: Moving Creditor Wilmington Savings Fund Society, FSB d/b/a christiana Trust, Not in it's individual capacity but solely as the trustee for the brougham fund I trust Date Case Filed 12/19/2016

Nature of Relief Sought:  Lift Stay  Annul Stay  Other (describe) \_\_\_\_\_

Chapter 13: Date of Confirmation Hearing \_\_\_\_\_ or Date Plan Confirmed 5/22/2017

Chapter 7:  No-Asset Report Filed on \_\_\_\_\_

No-Asset Report not Filed, Date of Creditors Meeting \_\_\_\_\_

1. Collateral
  - a.  Home
  - b.  Car Year, Make, and Model \_\_\_\_\_
  - c.  Other (describe) \_\_\_\_\_
2. Balance Owed as of Petition Date \$247,250.37  
Total of all other Liens against Collateral \$0.00
3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.
4. Estimated Value of Collateral (must be supplied in *all* cases) \$175,000.00 (per Amended Schedule A/B)
5. Default
  - a.  Pre-Petition Default  
Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_
  - b.  Post-Petition Default
    - i.  On direct payments to the moving creditor  
Number of Months 3 Amount \$5,477.12
    - ii.  On payments to the Standing Chapter 13 Trustee  
Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_
6. Other Allegations
  - a.  Lack of Adequate Protection § 362(d)(1)
    - i.  No insurance
    - ii.  Taxes unpaid Amount \$ \_\_\_\_\_
    - iii.  Rapidly depreciating asset
    - iv.  Other (describe) \_\_\_\_\_
  - b.  No Equity and not Necessary for an Effective Reorganization § 362(d)(2)
  - c.  Other "cause" § 362(d)(1)
    - i.  Bad Faith (describe) \_\_\_\_\_
    - ii.  Multiple Filings
    - iii.  Other (describe) \_\_\_\_\_
  - d. Debtor's Statement of Intention regarding the Collateral
    - i.  Reaffirm  Redeem  Surrender  No Statement of Intention Filed

Date: 10/15/18

/s/ Nisha B. Parikh

Counsel for Movant

Loan#	
Borrower:	Hopkins
Date Filed:	12/19/2016
First Post Petition	
Due Date:	1/1/2017
POC covers:	4/1/16 - 12/1/16





















